3634 7th Avenue, Apt. 12BC San Diego, CA 92103 April 28, 2016

### Affidavit of James Jaranson, MD, MA, MPH

I, James Jaranson, MD, having been duly sworn, do hereby state as follows:

## Qualifications:

- 1. My name is James Jaranson. I am a licensed physician in good standing in the state of Minnesota. I am a California resident with principal residence in San Diego, but I maintain a second residence in Minneapolis, Minnesota. I retired from clinical psychiatric practice in 2003 but volunteer extensively in the field of torture rehabilitation as a consultant, researcher, and editor. I am vice-chair of Survivors International, the torture treatment center in San Diego, California. I am a member of the Research and Data Subcommittee of the National Consortium of Torture Treatment Programs in the US and its Advisory Committee for research. I continue to review articles submitted for publication to many journals, including the Torture Journal published by the International Council for Torture Victims, Copenhagen, Denmark, for which I am an editorial advisory board member.
- 2. From 1984-1997 I directed International Mental Health, University of Minnesota at St. Paul-Ramsey Medical Center (Regions Hospital), St. Paul, Minnesota, and was employed initially in 1985 as the psychiatrist and subsequently until 2001 the Medical Director of the Center for Torture Victims in Minneapolis. From 1985-1989 I was a faculty Member of the Refugee Mental Health Technical Assistance Center (TAC), University of Minnesota, and from 1992-1998 directed the Cultural Psychiatry Training Program at the University of Minnesota. I am the Principal Investigator, Refugee Population Study, Division of Epidemiology, University of Minnesota, which examined torture and trauma in the Somali and Ethiopian Oromo communities in the Twin Cities, funded from 1998-2003 by two NIMH grants and currently in the data analysis phase.

# 3. Other professional activities:

From 1992-2000 I was the US representative on the International Rehabilitation Council for Torture Victims (IRCT), based in Copenhagen, Denmark, and, subsequently, from 2003-2009 as an Independent Expert on the Executive Committee of the IRCT. I served on the Board of Directors, Society for the Study of Psychiatry and Culture, from 1996-2014 and currently Chair the Elections, Bylaws and Awards Committee. From 1996-2008 I co-chaired the Section on the Psychological Consequences of Torture and Persecution, World Psychiatric Association.

4. Education and Professional Credentials:

I graduated summa cum laude with a major in English from Concordia College in 1969. In 1973 I completed medical school at the University of Minnesota, then my residency in psychiatry and concurrently a masters degree in medical anthropology in 1976. In 1979 I completed a masters degree in public health in psychiatric epidemiology at Harvard **DEFENDANT'S** University. I am board certified in both psychiatry and in general preventive medicine.

EXHIBIT

#### 5. Relevant Presentations selected from more than 200:

Post Traumatic Stress in Refugees and Torture Victims. The Many Faces of Trauma: 3rd Hawaii Conference on PTSD, Honolulu, Hawaii, February 3, 1988.

Treatment Modalities in Post Traumatic Stress. The Many Faces of Trauma: 3rd Hawaii Conference on PTSD, Honolulu, Hawaii, February 4, 1988.

Diagnosis of Psychiatric Disorders in Refugees, presented in APA Course #56, Diagnosis and Treatment of Refugees, 142nd American Psychiatric Association Annual Meeting, San Francisco, California, May 9, 1989.

PTSD Among Refugees, presented at the First International Conference on the Mental Health and Psychosocial Wellbeing of Refugees and Displaced Persons, Stockholm, Sweden, October 9, 1991.

Diagnosis of Post Traumatic Stress Disorder in Refugees, presented in APA Course #17, PTSD in Refugees: Comprehensive Assessment in Treatment Planning. American Psychiatric Association Annual Meeting, Washington, D.C., May 3, 1992.

Torture, PTSD and Culture, presented at the Scientific Institute on Ethnocultural Aspects of Post-Traumatic Stress and Related Stress Disorders: Issues, Research, and Directions, Honolulu, Hawaii, June 27- July 2, 1993.

Ethnocultural Aspects of Traumatic Stress in Torture Victims, presented in Symposium, Psychiatric Sequelae of Massive Trauma: A Cultural Perspective, Society for the Study of Psychiatry and Culture, Rockport, Massachusetts, October 1, 1993.

The Influence of Culture on Traumatic Sequelae in Survivors of Governmental Torture: the Experience of the Center for Victims of Torture. Presented in Mental Health Programmes for Torture Survivors and Abstracted, World Psychiatric Association Regional Symposium, Prague, Czech Republic, September 21, 1995.

Presented a chapter overview at the "book launching," New York City, October 29, 1998. Engdahl, B., Kastrup, M., , Jaranson, J., and Danieli, Y: "The Impact of Traumatic Human Rights Violations on Victims and the Mental Health Profession's Response", Chapter 25, in Y. Danieli, C.J. Dias, E. Stamatapoulou (Eds.) The Universal Declaration of Human Rights Fif ty Years Later, Baywood Press, 1998, pp.337-355.

Participated as an invited expert to finalize draft of the Istanbul Protocol for the United Nations, Istanbul, Turkey, March 9-14, 1999, and Geneva, Switzerland, August 9, 1999.

Torture and War Trauma, presented in day-long conference, Flight from Terror to Recovery: Understanding the Refugee Experience, Century College, White Bear Lake, MN, April 5, 2000.

Identifying Torture and Violence Among Resettled Refugee Populations, in The Spectrum of Sequels to Torture and Political Violence, XXVth Anniversary Congress on Law and Mental Health, Siena, Italy, July 13, 2000.

Institute of Medicine Workshop on the Psychological Consequences of Terrorism and Systems for Response. Respondent to the Panel on the Psychological Consequences of Terrorism, October 7, 2002, Washington, D.C.

Tortured and Traumatized Somali and Ethiopian Refugees in Minnesota: Reactions to 9/11 and Subsequent Re-traumatizing Events. Presented at Psychiatric Care Across Cultures, Malta, November 9, 2003

With Jose Quiroga. Half day workshop: Evaluating Treatment Outcomes of Torture Survivors and Extreme Trauma in a Resource Poor Environment. In Re-Making the World of the Trauma Survivor: The Treatment of Extreme Trauma, Flagstaff, Arizona, October 2, 2009.

## **Background Information:**

- 1. Although I have never personally interviewed Rasmieh Yousef Odeh, I have reviewed the affidavit submitted by Dr. Mary Fabri before the US District Court Eastern District of Michigan Southern Division, Criminal No. 13-20772, regarding defendant Rasmieh Odeh, July 18, 2014. I have also reviewed the Evidentiary Hearing, US District Court Eastern District of Michigan, Southern Division vs. Rasmieh Yousef Odeh, Defendant, No. 13-cr-20772, in which Dr. Mary Fabri was directly examined and cross-examined on October 21, 2014. Finally, I have reviewed the opinion of the of the US Court of Appeals for the Sixth Circuit October 14, 2015, decided and filed on February 25, 2016, File Name: 1600051p.06, re: Rasmieh Yousef Oden, Defendant-Appellant.
- 2. Dr. Fabri's evaluation of Rasmieh Yousef Odeh, in my opinion, is thorough and well-considered. I find no fault with any of her observations or conclusions.
- 3. Regarding the specific referral question, "Could PTSD affect Ms. Odeh's interpretation of questions about being arrested, convicted, or in prison on an application for naturalization" (p. 18, Fabri Affadavit), I agree with Dr. Fabri's response. I believe that Ms. Odeh is indeed vulnerable for the reoccurrence of PTSD and could have cognitively processed questions about the past to avoid recalling traumatic experiences.

Respectfully Submitted By:

James M. Jaranson, MD MN Med License #21832

Paluia Louise Schopp 4/28/16

